NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES

EX PARTE

March 22, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW B204
Washington, DC 20554

Re: In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35

NASUCA'S Response to Petitions for Reconsideration

Dear Ms. Dortch:

In accordance with Section 1.1206(a) and (b)(1) of the Commission rules, please consider this response to Petitions for Reconsideration as an *ex parte* communication.

I. INTRODUCTION

The National Association of State Consumer Utility Advocates (NASUCA),[1] hereby responds to petitions for reconsideration filed in this proceeding, specifically as to issues raised

[1] NASUCA is a voluntary association of 44 advocate offices in 41 states and the District of Columbia, incorporated in Florida as a non-profit corporation. NASUCA's members are designated by the laws of their respective jurisdictions to represent the interests of utility consumers before state and federal regulators and in the courts. See, e.g., Ohio. Rev. Code Chapter 4911; 71 Pa. Cons. Stat. Ann. § 309-4(a); Md. Pub. Util. Code Ann. § 2-205; Minn. Stat. § 8.33; D.C. Code Ann. § 34-804(d). Members operate independently from state utility commissions as advocates primarily for residential ratepayers. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General's office). NASUCA's associate and affiliate members also serve utility consumers but are not created by state law or do not have statewide authority.

therein that are of major concern to residential ratepayers. NASUCA represents the residential consumers who incur the considerable financial cost, inconvenience, and threat to health and safety that result from wireline, wireless and satellite communications disruptions. Although maintenance, repair and improvement of the network are voluntary, the Commission nonetheless has the obligation to monitor the health of the Nation's telecommunications services, based on objective data as recognized in Par. 18 of its August 19, 2004 Outage Order.[2] As also recognized in Par. 18, both in quantity and quality of reporting, the telecommunications industry trial of voluntary reporting failed to provide the Commission with what it needed to fulfill that important responsibility.

Previous reporting requirements developed in the early 1990's were limited to wireline service providers and were no longer in step with current technology. The public interest was likewise not served by the previous reporting metric which insulated from reporting requirements any disruption that did not affect at least 30,000 end users and last at least 30 minutes. Even with the data it did collect, the Commission had not assumed responsibility for analyzing that data and providing its analysis to the public.

In the Outage Order, the Commission correctly recognized that it must now impose new mandatory reporting requirements that apply to wireless and satellite communications, including a new metric that would establish a general outage-reporting threshold for *all* covered communications providers, and provide an analysis of the data to the public. NASUCA strongly opposes various attempts embodied in Petitions for Reconsideration now under review that would undermine achievement of those public interest goals.

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[2] *New Part 4 of the Commission's Rules Concerning Disruption to Communications*, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 16830 (2004) (Outage Order).

II. NASUCA supports a reasonable modification of the rules to allow an expanded period of time in which DS3 simplex events are to be reported. However, nothing in the record supports a recently approved modification allowing an extension of the reporting period to five days instead of 120 minutes.

A DS3 is described in Par. 136 of the Outage Order as a communications highway that carries traffic in digital format. As part of a SONET ring a "protect DS3" functions essentially as a network system backup scheme. In what is referred to as a DS3 simplex event, if one path in a primary DS3 system fails, the SONET ring's "protect DS3" is activated. It so quickly re-routes traffic in the opposite direction on to the other path that customers are unaware of the split-second shift. There is neither a requirement as to how quickly a DS3 infrastructure failure must be repaired nor a time limit on how long a carrier may run the system on the protect DS3 backup.

Because there is no backup to the backup, however, if a second system failure occurs before the original primary DS3 failure has been repaired, the communication services will no longer be protected and that second failure will cut off all service. Par. 134 of the Outage Order requires carriers to report DS3 simplex events if they fall within the DS3 metric standard. Until *both* paths are operating properly, i.e., the primary DS3 *and* the protect DS3 (backup), the minutes calculated from the time of the initially-failed primary DS3 count toward the DS3 minutes metric in determining whether an outage report must be filed. Thus Par. 134 requires that the outage report stays on the books, so to speak, until reliance on backup has ended once all DS3 failures in the system have been repaired and the system is again fully operational.

Carriers campaigned aggressively to have this reporting requirement eliminated, claiming that because the protect DS3 backup is activated, no outage occurs in a DS3 simplex event. Industry further claimed it would cost millions to reconfigure the DS3 so that the carrier could separately record the information necessary for making such a report and would cost additional millions each year to make such filings. It is important for the Commission to recognize,

however, that the industry assertions of compliance costs were not documented, let alone verified. The cost benefit analyses presented, e.g., by Qwest, failed to include any offset for the societal safety and economic costs of such preventable outages. Despite the failure to make such a showing, immediately prior to the January 3, 2005 effective date, the DS3 reporting requirement of Par. 134 of 120 minutes was modified and is now triggered only if the DS3 simplex condition extends beyond five days.

NASUCA's Response: NASUCA emphasizes both its strong support for the legitimate core principle reflected in Par. 134 of the Outage Order and its concern about the recent modification of that paragraph's reporting requirement. It is precisely because there is no backup to the backup that reliance upon the "protect DS3" should be as brief as reasonably possible to prevent the safety concerns and the economic burden subsequent unprotected outages create. After all, as we are reminded in Par. 135 of the Outage Order, those circuits are critical not only for voice traffic but also for commerce and national defense, including, Federal Reserve, ATM and other bank and commercial transactions, FAA flight controls, the Defense Department, etc. Although the Commission does not dictate how quickly failures must be repaired, there is an important and practical public policy result of the reporting requirement of Par. 134: It provides a disincentive for unreasonable delay either in the maintenance or repair critical to preventing such outages.

NASUCA supports a modification of the requirements for DS3 incident reporting if a reasonable balance is struck. An acceptable modification would have been one that alleviated credible concerns of carriers while ensuring that the Commission obtains data needed to monitor the network. Otherwise the Commission cannot fulfill its obligation to prepare a comprehensive and accurate assessment of network vulnerability as a result of untimely maintenance and repair.

To be sure, there are circumstances in which delay in repairing a DS3 incident may be reasonable as well as sensible. For example, a carrier may be facing cuts in multiple trunks. In some trunks the cuts may be the result of an electronic failure in which only one path is affected and backup has been activated, resulting in no service disruption. In others, the trunk itself may be cut in which case neither path is operational and service has been disrupted. Delay in repairing the former failures in order to prioritize the later should be encouraged.

Accordingly, it may have been appropriate to allow some modest modification of Par. 134's requirement. For example, requiring that the DS3 incident be reported in twenty-four, not two hours, would have accommodated carriers' stated desire to schedule repairs within twenty-four hours according to common industry practice, while still enabling them to do so during the regularly scheduled off-peak maintenance period of midnight-6.a.m. This would have extended the time before the requirements of Par. 134 kick in. Yet it cannot be overstated that even during that 24-hour period, the system is operating without backup and is thus exponentially more vulnerable to total system failure with resulting costs both as to voice and data traffic not transmitted.

However, nothing has been presented to support the substantial modification of the 120-minute initial reporting requirement in Par. 134 to instead be **5 days**. NASUCA has reviewed the 2002 and 2003 ARMIS data showing the number of hours to <u>restore</u> out-of-service lines to residential consumers in both urban/rural states and predominantly rural states. According to the data from the Service Quality Reports and from Table II of Report 43-05, repair times for residential local service consumers do not even approach the five-day period now allowed in the rule to report a DS3 incident. For example, Illinois shows a repair time of 15.0 and 15.2 hours in 2002 and 2003, while New York shows a repair time of 24.9 hours and 34.0 hours in 2002 and

2003. Georgia and Colorado show repair times of 18.4 and 19.7 hours and 12.4 and 16.2 hours for 2002 and 2003, while Alabama and Kansas show repair times of 28.3 and 30 and 21 and 22 hours in 2002 and 2003.[3] The repair times for interexchange access customers, shown in Table I of Report 43-05 are substantially less, with switched access repair intervals ranging from 0.40 hours in Alabama to 9.2 hours in Kansas for the major carriers in the states mentioned above.[4] Certainly it is reasonable to conclude that if carriers can *restore* service in significantly less than 5 days they certainly should be required to *report* the DS3 failures in far less than 5 days.

The industry's argument of pre-compliance costs for reconfiguration was baseless when raised and is now moot inasmuch as reconfiguration costs, if any, would have been incurred prior to the Commission's modification on the eve of the January 3, 2005 effective date of the new rules. Thus, as of January 3, 2005, the Petitioners' prime argument for modification, i.e., pre-compliance reconfiguration costs, had evaporated and was proven specious at best.

It is therefore reasonable to conclude that the DS3 outcry was not driven by cost considerations but by a desire to avoid Commission scrutiny of those situations in which maintenance and/or repairs are not prompt. Another presumed factor is carrier preference for "cleaner" performance records, not muddied up by inclusion of DS3 simplex events in the reports. For marketing and future regulatory considerations, carriers want to eliminate such blemishes from their record even though outage reports are no longer publicly available.

Prior to 2005 a number of incidents were reported where both the primary and protect DS3 paths had failed but the time interval was not included in the report. It cannot be determined

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[3] See http://svartifoss2.fcc.gov/eafs/preset/servicequality/SQReport5.cfm for the ARMIS data for individual states, ILECs and other categories.

[4] Table I shows the following repair intervals for switched access for the years 2002 and 2003: Illinois, 5.9 and 4.2; New York, 2.4 and 3.4; Georgia, .70 and .50; Colorado, 2.20 and 1.30; Alabama, .40 and .40; and Kansas, 9.20 and 4.6. Available at http://svartifoss2.fcc.gov/eafs/paper/43-05/PaperReport05.cfm.

from those incident reports whether the subsequent failure of the DS3 protect path was related to a failure to repair the primary DS3 in a timely manner. However, Par. 134 cites one instance in which there was a five-month interval between the first and subsequent incident. The extent of preventable outages is of grave concern to the public and the Department of Homeland Security (DHS) and outage-reporting data should always be the subject of further reasonable review. Particularly since outage reports are no longer available for public inspection, consumers depend upon the Commission to examine such data to determine whether a resulting disruption of service would have been avoided if timely repair had been made following the initial DS3 failure.

Under the new rules the Commission will prepare and release analyses based on the outage reports that have been filed. That assessment must address the extent of network vulnerability resulting from DS3 backup not being available as protection following a subsequent failure because it is *already* being relied upon pending repair of the primary DS3. The DS3 reporting requirement of Par. 134 was intended to ensure that the Commission will be able to base its analysis on reported data, not speculation. That important goal was undermined by the Commission when, just prior to the effective date of the new rules, upon its own motion, it modified the 120-minute reporting trigger of Par. 134 and expanded it to five days. Commission analysis of network reliability should include a discussion of this modification and its effects; for example, how many reports filed since the effective date of the rules reveal that a carrier failed to repair a primary DS3 for five days or more? For each such situation, how many potentially affected working telephone numbers were thus vulnerable to an outage because reliance upon the backup was allowed to continue for five days or more? That analysis and report should, for example, make clear by month or quarter, the number of such situations identified from the DS3

incident reports, the scope of potentially affected working telephone numbers, and the duration of that vulnerability, e.g., be it days, weeks or months.

III. NASUCA opposes the request in OPASTCO's Petition for Reconsideration that the 120-minute initial reporting requirement be revised.

In its Petition for Reconsideration, OPASTCO raises two largely rural-carrier-specific issues: the method and timing of the initial outage report. OPASTCO insists that in extremely sparsely populated areas the requirement of bare bones reporting within 120 minutes of an outage is, as a practical matter, impossible in cases where severe climate conditions may result in an outage, e.g., Alaska ice storms and tornadoes in the Great Plains. From a reading of the Petition one might conclude that most rural outages are the result of Acts of God. Furthermore, one is expected to assume that with limited carrier personnel in these rural areas, it is unreasonable and indeed ridiculous to require a carrier to deploy an employee to go off and find a fax machine or working Internet connection to report the outage within the 120-minute deadline. The argument is made that the employee is instead more critically needed to report to the site and begin the assessment needed for the fastest possible service restoration. OPASTCO recommended that oral reporting to the Commission within 24 hours should be deemed sufficient to satisfy the initial reporting requirement.

NASUCA's Response: What OPASTCO describes is the time it takes in remote areas for carrier personnel to arrive at the site and assess the problem. That is both distinct from and irrelevant to the brief time it would take to simply first *report* that an outage has occurred. A sample initial reporting form was issued by the Commission in its December 28, 2004 Public Notice (DA-4059). Given the meager amount of information required in that initial report,

submission should not create any appreciable delay in an employee's arrival at the location, regardless of the size of the company's work force.

One practical measure would be for such carriers to own and deploy satellite cell telephones so that the appropriate personnel could telephone a colleague at a different location and dictate the information that is to be forwarded as the initial report. Small carriers with limited sized staff as characterized in the Petition could also make advance arrangements to cooperate with each other if any carrier is in such a situation. Each carrier would agree to make its staff available for faxing or emailing the initial report into the Commission as dictated to them by a staff member of the carrier experiencing the outage. During an outage crisis such effort would be a practical and common sense approach if satellite phones were not available for that purpose. Or carriers might in advance individually or collectively make arrangements to rely on the staff of an industry trade association to which they belong (e.g., OPASTCO) so that an association employee would receive the oral report from the carrier and transmit such information to the Commission. That would appear to be a reasonable benefit of association membership.

What undermines the credibility of OPASTCO's position as a good faith argument is the contention that what is needed is a change in the rules so that the initial report could be provided within 24 hours rather than the 2 hours permitted under the rules. Absolutely no reason is given even under the scenarios included in the Petition as to why **an additional 22 hours** is needed to make the bare bones preliminary report the rules require. The Petition does not even suggest let alone argue that the security considerations that envelop the Order are any less important in sparsely populated areas than in densely populated areas. Rural areas are in fact the sites of military installations, dams, nuclear reactors and other facilities of national security importance.

It is assumed that the Commission and DHS need to know as soon as possible if there is an event or a nearly simultaneous series of events having a widespread affect on communications. Having to wait 22 hours would be unresponsive to that need.

NASUCA takes note of the Comments filed May 25, 2004 by the City of New York, National League of Cities, and National Association of Telecommunications Officers and Advisors (NY City *et al.*). Included in those comments is a persuasive depiction of the need for immediate access to outage information in order to respond to emergencies based on experience gained during the September 11, 2001 terrorist attacks and the 2003 outage. The compelling case is made that the loss of *any* 911 call is critical, and prompt reporting of outages is essential to protecting life and safety. It was those experiences that led these parties to urge the Commission to adopt *15 minutes* as the trigger for reporting any network failure affecting PSAPs. NY City *et al.* at 17. Thus, regardless of the basis on which *any* Petitioner has requested a change in the rules so as to extend the time within which an initial outage report must be filed, the NY City *et al.* comments are particularly relevant.

IV. NASUCA does not oppose OPASTCO's request for confirmation or clarification as to when the time begins to run during which the initial report must be made.

The Outage Order requires an initial report to be filed within 120 minutes of "first knowledge" or "discovery" of the outage. OPASTCO claims that language is ambiguous as to when the 120-minute deadline begins to run. In the scenario described in the OPASTCO Petition, company personnel initially concluded that the reporting threshold was not met. Over a longer period, however, it became known that the outage was company wide. (By implication one is to assume that the outage in this scenario met the new common metric requirement described in fn. 5 of the Outage Order, i.e., the outage that lasted at least thirty minutes and

potentially affected at least 900,000 user-minutes, and was thus reportable.) Therefore it became apparent to the carrier in this scenario that the reporting threshold was reached at some point even though the "outage" occurred six hours earlier. OPASTCO seeks clarification as to when the 120-minutes time requirement begins to run.

NASUCA's Response: For the scenario described in the Petition it appears clear that the initial reporting clock (120 minutes) would not begin to run until the carrier actually knew the situation came within the reporting standard, i.e., the clock would begin to run once it was known the failure rose to the level that triggers the requisite reporting requirement even though this knowledge came six hours after the initial system failure that had at first appeared small in scope.

Though that interpretation of the rules appears obvious, NASUCA would not object to formal Commission confirmation that the 120 minutes begins to run only at the time the carrier knows the threshold has been reached. That standard is certainly far more generous to carriers than the "known *or reasonably should have known*" standard typically applied in establishing negligence. Further, if the carrier files an initial report on the mistaken assumption that the threshold will be reached, and later discovers that is not the case, it would be reasonable to allow the carrier to withdraw that initial outage report. This would appear to be one of the "appropriate circumstances" for authorized withdrawal already covered under the rules and as further discussed below. In other words, this problem described by OPASTCO in its Petition appears to be a non-problem.

V. NASUCA Opposes the request in BellSouth's Petition for Reconsideration that a different metric be used in establishing the reporting threshold in outages arising from the non-intelligent network.

BellSouth claims there is a significant and practical distinction between the intelligent network (switching) for which the new metric is do able and the non-intelligent network (feeder cable and DLC systems) for which it is not. For the non-intelligent network it seeks substitution of an outage reporting metric of 600 or more cable pairs affected and duration of five or more calendar days after discovery.

NASUCA's Response: The number of "working telephone numbers" is the factor used under the new rules to determine the outage's scope instead of "number of customers." Cable pairs are not synonymous with "working telephone numbers." BellSouth knows how many "working telephone numbers" are affected *regardless* of whether the problem originated in an intelligent or in a non-intelligent network. Thus whatever "significant" difference there may be between intelligent and non-intelligent networks, for purposes of the outage reporting rules, there is no relevant distinction. For consumers an outage is an outage ... is an outage ... is an outage .... regardless of whether the problem is in the switching, cables, DLC systems, etc. The reporting requirements should be identical for intelligent and non-intelligent networks.

Like the DS3 simplex/backup outcry, it appears more likely that BellSouth may be grasping for an excuse to eliminate outage reports it would have to file. It has pulled a meaningless network distinction out of the sky in order to create an invalid exemption. By way of analogy, a pharmaceutical company required to report deaths of persons participating in a clinical trial would never be allowed to withhold such information for those who die lying down and report only those who die sitting up, if such "distinction" is irrelevant to the clinical trial and cause of death.

VI. NASUCA does not oppose carriers' request for clarification as to the reporting role and responsibility of resellers.

In their Petitions for Reconsideration, BellSouth and Sprint claim clarification is needed regarding the reporting obligation of resellers that do not own, operate or maintain any facilities of their own. For example, BellSouth points to inconsistencies in language in the rule proposed and the rule finally adopted in the Order. Sprint further seeks clarification to confirm that LECs, not wireless carriers, have the obligation to report outages in situations in which they are delivering 911 calls from a wireless phone user to a PSAP.

NASUCA's Response: Although the primary reporting requirement does rest with the LECs, resellers have important reporting obligations. For example, only the reseller knows how many telephone numbers in the block it acquired from the LEC are operational and thus affected by the outage. The reseller must be obligated to provide that information, as it is otherwise unavailable. Separate reporting by resellers of wireline and wireless also serves as a practical fail-safe protection if the carrier customer's personnel are not available to perform that reporting task. Further, separate reporting ensures that both the Commission and DHS will have a deeper understanding of the full impact of an outage. This is particularly critical in situations affecting health and public safety where consumers increasingly place reliance upon wireless communications.

VII. NASUCA opposes any change or modification of the rules with respect to planned outages.

In its Petition for Reconsideration, Sprint seeks clarification that in the case of planned outages only one report should have to be filed (within 72 hours of the outage). As it did in its initial Comments, Cingular again argues in its Petition for Reconsideration that planned outages should be treated differently for reporting purposes because they are typically scheduled to take place during the midnight-6.a.m.period, causing "minimal consumer disruption."

NASUCA's Response: Again, there is no relevant distinction for consumers between a planned and an unplanned outage. An outage is an outage regardless of when it occurs. The fact that the impact of a planned outage is likely to be *less* severe between midnight and 6 a.m. is of no comfort to those who actually suffer the consequences of an outage, e.g., businesses that rely on automatic data transfers made continuously around the clock, numerous night shift work forces and customers dependent on having communications services available regardless of the hour. Certainly the time of day does not remove the security concern at sites of importance to national security.

In its Outage Order at Par. 114, the Commission wisely refused to grant Cingular's request, concluding that the reporting requirement provides an effective incentive for the carriers to use maintenance testing and upgrade procedures that do not necessitate disruption of service. Absent such reporting rules, the industry and equipment vendors would have little if any incentive to design and utilize equipment and procedures that allow for maintenance, repair and upgrade without imposing an outage, even if "planned." Nor is such planned/unplanned outage distinction relevant to stated national security concerns. NASUCA strongly supports the Commission's rejection of this requested modification.

VIII. NASUCA does not oppose confirmation and reasonable clarification that an initial report can be withdrawn or modified under appropriate circumstances.

Certainly it is impossible for the rules to delineate with all-inclusive specificity what would constitute "appropriate" circumstances to withdraw or modify an initial report. Of necessity there is a learning curve underway in these initial months of implementation. Both industry and Commission staff are dealing every day with the practical aspects of the new rules that have been in effect for little more than one month. It is important that the rules not be

sabotaged under the guise of inserting but a minor tweak or exemption if such change is inconsistent with principles of common sense and with the public interest, including national security considerations.

If feasible, some clarification may be of practical assistance to the industry. Might the Commission, based on its experience to date, and as anticipated, perhaps provide a non-exhaustive list of categories of withdrawals presumed to be "appropriate" and those presumed "inappropriate"? Notwithstanding support for any such benign clarification, a caveat is in order. Given this initial adjustment phase to the new reporting rules and the expanded nature of entities now obligated to report, the Commission has an opportunity, and NASUCA contends an obligation, to review withdrawn reports and analyze them with specific public policy and enforcement principles in mind.

For example, if patterns reveal that any carrier frequently withdraws its initial reports, the Commission should carefully examine the circumstances. On the one hand, are there carriers that routinely take a conservative approach at the outset and file an initial report even before it is absolutely certain the threshold has been reached but accompany the subsequent withdrawal with a credible basis for concluding the reporting threshold was not reached? That would presumably be considered a benign reason for the withdrawal and should be allowed. On the other hand, are there carriers that withdraw initial reports in large numbers with no explanation given or none that are credible?

A reasonable policy on initial report withdrawal should strike an appropriate balance so as to allow the former but not the later practice. Carriers should not be allowed to withdraw outage reports in order to mask serious problems. The reporting process will devolve into farce, and the Commission's oversight authority will be seriously compromised, if carriers are allowed

to withdraw initial reports willy-nilly yet advertise or market on the basis of service quality at odds with the facts. Such practice would be both anti-competitive and anti-consumer. Given the risk to health and public safety posed by outages, and in light of the fact that the outage reports are no longer publicly disclosed, the Commission's oversight responsibility is more critical than ever.

The Commission should make clear that it has a strict obligation to assess withdrawals, particularly patterns of withdrawals, and, that it intends to exercise its authority to seek and obtain whatever additional information is necessary to assess the withdrawal. No withdrawal should be accepted unless the Commission is fully satisfied that the outage was not reportable; a heavy burden of proving by clear and convincing evidence rests and remains with the carriers as to the justification for such withdrawal.

IX. NASUCA agrees that SS7 providers do not have primary reporting requirements but do have an obligation to provide its carrier customers with information needed for reporting purposes.

In its Petition for Reconsideration, Syniverse claims it is difficult for a third-party SS7 provider to report blocked or lost calls and that using MTP as a surrogate will not be meaningful. It therefore seeks elimination of the reporting requirement for SS7 providers except where its carrier customer becomes isolated from a signaling perspective for at least 30 minutes.

NASUCA's Response: Analogous to its position with respect to the role of resellers, NASUCA agrees that the primary reporting requirement rests with the LECs. However, there remains a specific and important role for the resellers: Only the reseller knows how many of the telephone numbers it acquired are working and thus affected by the outage for purposes of determining whether the reporting threshold has been met. The reseller should make this

information immediately available to the LEC (the carrier customer) so it can be included in the outage report.

X. CONCLUSION

With respect to the issues raised herein, NASUCA urges the Commission to deny the Petitions for Reconsideration. No persuasive evidence has been presented to support those recommendations put forth in the Petitions. In fact, such modifications would weaken Commission authority at a time that it must be exercised more firmly than ever before because of (1) heightened national security concerns, (2) reporting data no longer made public, and (3) the high economic cost and risk to health and public safety that result from outages.

Sincerely,

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